

EXHIBIT A

Atkinson-Baker, Inc.
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION

CHAZ PINKSTON, #148934,)
Plaintiff,)
v.)
DR. HENDRICK KUIPER,)
Defendant.)

CERTIFIED COPY

Civil Action No.
4:17-cv-039-DMB-DAS

VIDEOTAPED DEPOSITION

OF

LEATHA ANN BARRON

MORROW, GEORGIA

January 30, 2019

ATKINSON-BAKER, INC.
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REPORTED BY: SHARON J. JOHNSON, CCR B-1902, CVR-M 3291
FILE NO. AD00953

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1 sworn in by the court reporter.

2 MS. RUCKER: My name is Candice Rucker.
3 I am here on behalf of the defendant,
4 Dr. Hendrick Kuiper.

5 (Witness sworn)

6 MS. RUCKER: Thank you, Ms. Barron. My
7 name is Candice Rucker. We've spoken on the
8 phone several times about this deposition, and
9 I'm going to be asking you some questions for
10 the next few minutes.

11 Before we get started, I would like the
12 record to reflect that Plaintiff Inmate Chaz
13 Pinkston refused to participate in today's
14 deposition. Yesterday I received a call from
15 MDOC staff informing me that Pinkston did not
16 wish to participate in the deposition unless he
17 could be left alone and unsupervised. To do so
18 would constitute a security risk because he is
19 a violent offender. Nonetheless, we called the
20 prison this morning and offered Pinkston an
21 opportunity to participate in today's
22 deposition, and he refused. So with that,
23 we're going to go ahead and get started.

24 Whereupon,

25 LEATHA ANN BARRON